

Traub, M. Darren

From: Traub, M. Darren
Sent: Tuesday, April 21, 2009 5:50 PM
To: mdhlaw@haywoode.com
Cc: Kelly, William; Mollen, Scott
Subject: FW: Edmonds v. Seavey
Attachments: Bates 0001-0019.pdf

Mel:

At 5:35, we received, via ECF, your "motion for sanctions" informing the Court that we have refused to produce documents to you that were identified for photocopying by your office on Thursday evening. However, as shown by my e-mail below, the documents which you declare to the Court have not been produced, were in fact sent to you at 10:11 AM this morning.

Therefore, if you do not immediately withdraw your motion and correct the misstatements contained therein, we will point out to the Court the fact that you have had these documents for over 7 hours and still choose to file your baseless and patently false motion. In so doing, we will seek our costs and fees.

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From: Traub, M. Darren
Sent: Tuesday, April 21, 2009 10:11 AM
To: mdhlaw@haywoode.com; Kelly, William
Subject: Edmonds v. Seavey

Counsel:

Attached are documents bates labeled Seavey3R 0001 - 00019, which are being produced in response to Plaintiff's Third Requests for Production of Documents. Although the Seavey Defendants and Dalton have made substantially more documents available for inspection, these are the pages that Plaintiff has identified for reproduction.

Thank you.

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